

DYKEMA GOSSETT LLP
333 SOUTH GRAND AVENUE
SUITE 2100
LOS ANGELES, CA 90071

DYKEMA GOSSETT LLP
Jon D. Cantor (91852)
jdcantor@dykema.com
Laura P. Worsinger (51859)
lworsinger@dykema.com
Abirami Gnanadesigan (263375)
agnanadesigan@dykema.com
333 South Grand Avenue
Suite 2100
Los Angeles, CA 90071
Telephone: (213) 457-1800
Facsimile: (213) 457-1850

Attorneys for Defendant
FIS OPERATIONS, LLC d/b/a/
FRONTIER INTEGRITY SOLUTIONS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

CHRISTOPHER RIVERA, individually
and on behalf of all others similarly
situated,

Plaintiff,

vs.

FIS OPERATIONS, LLC d/b/a/
FRONTIER INTEGRITY SOLUTIONS,
a foreign limited liability company,

Defendant.

Case No. 5:19-cv-00237 JGB (SHKx)

Assigned to Hon. Jesus G. Bernal
Riverside, Courtroom 1

**DECLARATION OF JON D.
CANTOR IN SUPPORT OF
DEFENDANT FIS OPERATIONS,
LLC D/B/A FRONTIER
INTEGRITY SOLUTION'S
OPPOSITION TO MOTION FOR
PROTECTIVE ORDER AND FOR
CORRECTIVE NOTICE**

Date: October 7, 2019
Time: 9:00 a.m.

Complaint Filed: February 5, 2019
Trial Date: TBD

DECLARATION OF JON D. CANTOR

I, Jon D. Cantor, hereby declare as follows:

1. I am an attorney admitted to practice before the United States District Court, Central District of California and a member of the firm Dykema Gossett LLP, attorneys of record for FIS Operations, LLC d/b/a Frontier Integrity Solutions (“Frontier”). As such, I have personal knowledge of the facts set forth in this Declaration, and, if called as a witness, I could and would competently testify to such facts.

2. On April 25, 2019, Frontier and Plaintiff Christopher Rivera filed a Joint Stipulation to Stay Case Pending Mediation, which has been extended by this Court until at least September 23, 2019. As part of the Stipulation, the parties “agree[d] not to talk to class members, who do not seek to be represented by Class Counsel, *about* any matter relating to the lawsuit, at least until after an impasse is declared regarding settlement.”

3. In or around June 2019, acting in good faith, I had conversations with two former inspectors for Frontier. The purpose of my calls was to obtain information regarding Plaintiff’s personal residence. While Plaintiff alleges that he was not living in California, I had information that stated otherwise, and I was attempting to confirm that information with other inspectors. When I called the first inspector, that inspector immediately informed me that he did not want to speak with me. That conversation ended immediately. When I called the second inspector, I: (1) introduced myself as an attorney for Frontier; (2) asked if the inspector had been contacted by an attorney for Plaintiff about a lawsuit against Frontier; and (3) informed the inspector that I was seeking basic information about Plaintiff and where he resided. The second inspector volunteered information to me regarding Plaintiff and regarding the pay scale of Frontier and other companies. My conversation with the second inspector lasted less than 3 minutes.

4. At the time that I made the phone calls to the two inspectors, I did not recall that the Stipulation limited contact with putative collective and class members.

Jon D. Cantor

CERTIFICATE OF SERVICE

I hereby certify that on the below date, a copy of the foregoing document was filed electronically, with the Court's CM/ECF, which will provide notice of the same on the parties.

Dated: September 16, 2019

By: /s/ Abirami Gnanadesigan

Jon D. Cantor
Laura P. Worsinger
Abirami Gnanadesigan
Attorneys for Defendant
FIS OPERATIONS, LLC d/b/a/
FRONTIER INTEGRITY SOLUTIONS

DYKEMA GOSSETT LLP
333 SOUTH GRAND AVENUE
SUITE 2100
LOS ANGELES, CALIFORNIA 90071